

PEPPER & CORAZZINI

L. L. P.

ATTORNEYS AT LAW

1776 K STREET, N.W., SUITE 200

WASHINGTON, D.C. 20006

(202) 296-0600

VINCENT A. PEPPER
ROBERT F. CORAZZINI
PETER GUTMANN
JOHN F. GARZIGLIA
ELLEN S. MANDELL
HOWARD J. BARR
MICHAEL J. LEHMKUHL
SUZANNE C. SPINK
MICHAEL H. SHACTER
PATRICIA M. CHUH
LEE G. PETRO

NOT ADMITTED IN D.C.

DOCKET FILE COPY ORIGINAL
GREGG P. SKALL
E. MEDLOCK & LLYCK
OF COUNSEL

FREDERICK W. FORD
1909-1986

TELECOPIER (202) 296-5572

INTERNET PEPOR@COMMLAW.COM

WEB SITE HTTP://WWW.COMMLAW.COM

September 14, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Amendment of Section 73.202(b)
Table of Allotments
(Zapata, Texas)
MM Docket No. 98-133; RM-9314

Dear Ms. Salas:

Transmitted herewith on behalf of Encarnacion A. Guerra is an original and four copies of his Comments in support of the allotment of Channel 274A at Zapata, Texas and proposing the additional allotment of Channel 280A at Zapata, Texas, pursuant to the Notice of Proposed Rule Making, released July 24, 1998, in the above-referenced proceeding.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,


John F. Garziglia
Patricia M. Chuh

Enclosure

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WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 98-133
Table of Allotments)	RM-9314
FM Broadcast Stations)	
(Zapata, Texas))	

To: Chief, Allocations Branch

COMMENTS

Encarnacion A. Guerra, by his attorneys, pursuant to Notice of Proposed Rule Making, DA 98-1425, MM Docket No. 98-133, RM-9314, released July 24, 1998 ("NPRM"), hereby submits his comments in support of the allotment of Channel 274A at Zapata, Texas.^{1/} In addition to the allotment of Channel 274A at Zapata, Texas, Encarnacion A. Guerra hereby requests that the Commission also allot Channel 280A at Zapata, Texas. In support thereof, the following is respectfully submitted:

1. Since there is more than one expression of interest in the proposed allotment of Channel 274A at Zapata, Texas,^{2/} Encarnacion A. Guerra hereby advises the Commission that Channel 280A is also available for allotment to Zapata, Texas in full compliance with the Commission's separation requirements. See Attached Channel Study. In order to accommodate these multiple

^{1/} The NPRM specified a deadline date of September 14, 1998 for the filing of comments. Accordingly, these comments are timely filed.

^{2/} The NPRM stated that Arturo Lopez and Eleazar Trevino, Petitioners, intend to file an application for Channel 274A at Zapata, Texas if the channel is allotted. Encarnacion A. Guerra is also interested in providing a new FM service to Zapata.

interests, as well as others that may be filed, and so that Zapata, Texas may be further served by additional FM stations, Encarnacion A. Guerra respectfully requests that the Commission also allot Channel 280A to Zapata, Texas in addition to the allotment of Channel 274A at Zapata, Texas and amend the FM Table of Allotments as follows:

<u>Community</u>	<u>Present Channel</u>	<u>Proposed Channels</u>
Zapata, Texas	228A	274A; 280A ^{3/}

2. Encarnacion A. Guerra hereby states his present intention to apply for Channel 274A and/or Channel 280A at Zapata, Texas when allotted, and when authorized, to build a station or stations promptly. See Attached Statement of Encarnacion A. Guerra. Encarnacion A. Guerra also states his present intention to take any necessary action(s) so that he will be in compliance with the Commission's multiple ownership rules, should the need arise.

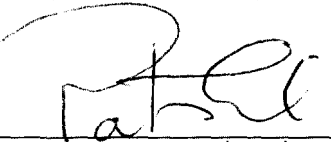
^{3/} Channel 280A may be allotted at reference coordinates 26° 54' 30" North Latitude and 99° 16' 18" West Longitude, the same coordinated proposed for the allotment of Channel 274A.

WHEREFORE, for the reasons above, the Commission should
allot Channel 274A and Channel 280A at Zapata, Texas.

Respectfully submitted,

ENCARNACION A. GUERRA

By:



John F. Garziglia
Patricia M. Chuh
His Attorneys

Pepper & Corazzini, L.L.P.
1776 K Street, N.W., Suite 200
Washington, D.C. 20006
(202) 296-0600

September 14, 1998

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Washington D.C. 20006

Additional Channel for Zapata, Texas

REFERENCE	CLASS A	DISPLAY DATES
26 54 30 N		DATA 08-30-98
99 16 18 W	Current rules spacings	SEARCH 09-11-98
----- CHANNEL 280 -103.9 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AL279	279A	Nuevo Laredo	TA	341.0	69.21	68.0	1.21 <
KBFM	281C	Edinburg	TX	121.9	168.70	165.0	3.70
AL279	279C	Monterrey	NL	217.2	174.63	165.0	9.63
XHITSF	279C	Monterrey	NL	217.2	174.63	165.0	9.63
AL277	277C	Ciudad Anahuac	NL	294.6	107.97	95.0	12.97
XHAHUF	277C	Ciudad Anahuac	NL	294.6	107.97	95.0	12.97
AL283	283A	Nuevo Laredo	TA	341.0	69.21	31.0	38.21

To the
Federal Communications Commission
Washington, D.C. 20554

**COMMENTS IN SUPPORT OF ALLOTMENT OF CHANNEL 274A AT ZAPATA,
TEXAS**

Comment Date: August 4, 1998

By Mr. Encarnacion Guerra, Owner / K.J.B.Z. - FM

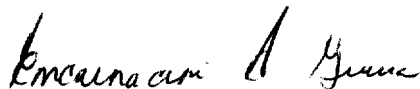
As the owner (Guerra Communications) of Radio Station KJBZ-FM in Laredo, TX, I would like to formally notify the Commission of my support for the proposed allotment of Channel 274A at Zapata, Texas.

My company has been and remains interested in serving the communities that surround Laredo, Texas. I believe that our acquisition of Channel 274A would allow us to maximize our efforts to serve this populace.

I believe that Guerra Communications is the Radio Group that most closely identifies with the citizenry at large in this unique border market. We therefore feel most qualified to pursue an additional broadcast outlet that would keep us at the forefront of public service in our area.

Once again, I emphasize my whole-hearted support for the Commission's consideration of allotting Channel 274A at Zapata, Texas.

Sincerely,



Mr. Encarnacion Guerra
Owner, KJBZ-FM
902 East Calton Road
Laredo, TX 78041

cc: Lyndon H. Willoughby
Willoughby & Voss
P.O.Box 701190
San Antonio, TX 78270-1190

cc: Patricia M. Chuh
Pepper & Corazini L.L.P.
1776 K Street N.W. Suite 200
Washington, D.C. 20006

CERTIFICATE OF SERVICE

I, Lisa A. Skoritoski, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that on this 14th day of September, 1998, copies of the foregoing Comments were mailed, postage prepaid, to the following:

Lyndon H. Willoughby

Willoughby & Voss

P.O. Box 701190

San Antonio TX 78270-1190

(Consultant to Arturo Lopez and Eleazar Trevino)



Lisa A. Skoritoski